

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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TIMOTHY STEELE and  
JUDITH STEELE, h/w  
*Plaintiffs*

v.

BLAKE & UHLIG, P.A.;  
LAUREN FLETCHER; and  
BOILERMAKERS NATIONAL  
HEALTH AND WELFARE FUND,  
*Defendants*

NO. 2:09-cv-02837-PBT

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**UNSWORN DECLARATION OF LAUREN FLETCHER**

1. I, Lauren Fletcher, am currently an attorney working for Blake & Uhlig, P.A., a law firm with its primary place of business in Kansas City, Kansas.

2. I currently live and reside within the state of Kansas.

3. At Blake & Uhlig I represented the Boilermakers National Health and Welfare Fund's (the "Trust") reimbursement claim and am familiar with the operations of its self-funded multi-employer group welfare plan (the "Plan").

4. The relevant portions of the Plan appended to the Motion to Dismiss Plaintiffs' Complaint or, in the Alternative, to Transfer the Case, are true and correct copies of the document.

5. The Boilermakers is a self-funded multi-employer group welfare benefit plan governed by the Employee Retirement Income Security Act ("ERISA") headquartered and administered in the state of Kansas. It is self-funded.

6. The individuals in charge of interpreting and operating the Boilermakers' Plan work in Boilermakers' headquarters in Kansas.

7. Furthermore, all original plan and trust documents are located in Boilermakers headquarters in Kansas.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/30/09

Lauren M. Fletcher  
LAUREN FLETCHER, Esquire